

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff**

v.

ROBERT BROCKMAN

Defendant.

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Case No. 4:21-CR-0009

MOTION FOR LIMITED APPEARANCE

The above-referenced criminal case is related to an under seal matter in this judicial district, Case Nos. 4:19-MC-59 and 4:19-MC-73 (which were consolidated into a single matter). A notice of related proceedings is attached as an exhibit to this motion (Exh. 1), and a separate notice of related proceedings was filed in the under seal matter. As the Department of Justice Tax Division filter team assigned to the under seal matter, the undersigned filter team respectfully moves this Court to appear in a limited capacity – specifically, to permit it to file a status report with this Court as to the materials in the under seal matter and to be available should the Court determine it needs to hear from the filter team regarding the related matter.¹

For these reasons, Tax Division Assistant Chief Jorge Almonte and Trial Attorneys Eric Powers and Jessica Moran respectfully move this Court to appear in a limited capacity as the filter team. The filter team’s relevant information is set forth separately in the attached forms requesting pro hac vice admission. (Exh. 2-4).

¹ The filter team is separate and distinct from the prosecution team and does not represent the United States generally in this matter.

Respectfully submitted,

RYAN K. PATRICK
United States Attorney
RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

_____/s/_____
JORGE ALMONTE
Assistant Chief
ERIC B. POWERS
JESSICA MORAN
Trial Attorneys
Department of Justice – Tax Division
Northern Criminal Enforcement Section

CERTIFICATE OF SERVICE

I, Eric B. Powers, certify that a copy of the foregoing MOTION FOR LIMITED APPEARANCE was served on all counsel of record via ECF on January 19, 2021.

/s/ Eric B. Powers

Eric B. Powers

Counsel for the United States – Filter Team